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December 13, 2011

By ECF

Hon. Kiyo A. Matsumoto
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. Christopher Barret, et al.
Ind. No. 10 Cr 809 (KAM)

Dear Judge Matsumoto:

This letter is respectfully submitted in response to the Court's Order, dated December 12, 2011, regarding pre-trial scheduling deadlines. The list of potential persons referred to during the trial should include the name Jo-Shanna Stennet.

As to exhibits, at present we do not have any. Although counsel has been working diligently in preparation for trial since my appointment at the end of September, we still are reviewing the discovery, and will continue to do so up to the commencement of trial. We anticipate sending subpoenas for cellular telephone records, but we still are gathering subscriber and carrier information. In that regard we have requested information from the government and await a reply. Accordingly, there is the possibility that Mr. Mitchell would offer cellular telephone records in evidence, but we do not presently have them to mark and exchange.

Mr. Mitchell adopts the proposed *voir dire* and verdict sheet filed on behalf of Kerry Gunter. The deadline for requests to charge was extended to December 19, 2011.

Respectfully yours,



Michael H. Sporn

MHS/ss
All Counsel (By ECF)